

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 00-6031-CR-ZLOCH
MAGISTRATE JUDGE SELTZER

UNITED STATES OF AMERICA, :

Plaintiff, :

v. :

JERRY FIELDS. :

Defendant. :

UNOPPOSED MOTION FOR LEAVE TO TRAVEL

Defendant, Jerry Fields, through counsel, respectfully moves for the entry of an Order modifying his conditions of bond to allow him to travel outside the District to Montego Bay, Jamaica, from April 18, 2000, until April 24, 2000. In support of this motion, Defendant states as follows:

1. Defendant made his initial appearance on February 7, 2000, on a counterfeiting indictment. He is currently free on a \$25,000, Personal Surety Bond. He entered a guilty plea to the one count indictment on March 27, 2000, and was continued on the same bond. On information and belief, his guideline range will be 0-6 months. Mr. Fields is a U.S. citizen. Standard conditions of bond do not permit travel outside the District without prior approval.

2. The defendant would like to travel to Montego Bay, Jamaica, from April 18-24, 2000, for business purposes (assisting with export of consumer goods to Jamaica). Defendant would be traveling via Air Jamaica, Flight 86, on April 18, and would return on April 24, via Air Jamaica,

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Flight 89. While in Montego Bay, Mr. Fields would be staying at Lot 375, West Gate Hills #336, Montego Bay, Jamaica, (876) 999-8159.

3. Pursuant to bond conditions, Mr. Fields has surrendered his passport to pretrial services. Defendant asks that the passport be returned to him temporarily in order to facilitate travel. He will return the passport to pretrial services upon completion of travel.

4. Mr. Fields previously made a similar business trip to Jamaica February 10-13, 2000, and travel was completed without incident.

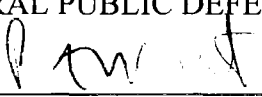
5. Undersigned counsel has contacted Scott Behnke, the Assistant United States Attorney handling this case for the government, who has authorized counsel to represent that the government does not oppose the granting of the relief requested in this motion.

WHEREFORE, the Defendant Jerry Fields, through undersigned counsel respectfully requests leave to travel out of the District as stated above.

Respectfully submitted,

KATHLEEN M. WILLIAMS
FEDERAL PUBLIC DEFENDER

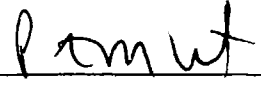
By:



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CERTIFICATE OF SERVICE

I hereby certify that a true a copy of the foregoing instrument was mailed this 7th day of April, 2000 to Scott Behnke, Assistant United States Attorney, 299 East Broward Boulevard, Fort Lauderdale, Florida 33301.



Patrick M. Hunt